

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

AMEREN TRANSMISSION COMPANY OF ILLINOIS)	
)	
Petition for a Certificate of Public Convenience and)	
Necessity, pursuant to Section 8-406.1 of the Illinois)	
Public Utilities Act, and an Order pursuant to Section 8-)	Docket No. 12-0598
503 of the Public Utilities Act, to Construct, Operate and)	
Maintain a New High Voltage Electric Service Line and)	
Related Facilities in the Counties of Adams, Brown,)	
Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton,)	
Macon, Montgomery, Morgan, Moultrie, Pike,)	
Sangamon, Schuyler, Scott and Shelby, Illinois.)	

**NOTICE OF SUPPORT BY RURAL CLARK AND
EDGAR COUNTY CONCERNED CITIZENS FOR THE ALTERNATIVE ROUTES
PROPOSED BY STOP THE POWER LINES COALITION**

Intervenor, RURAL CLARK AND EDGAR COUNTY CONCERNED CITIZENS (“RCECCC”), by one of its attorneys and co-counsel, William F. Moran, III, hereby notifies the Illinois Commerce Commission and the parties to this proceeding of its support for the Alternate Routes on the Kansas to Indiana State Line portion of this power line project proposed by Intervenor, STOP THE POWER LINES COALITION (“STPL”). In support, RCECCC states as follows:

1. On December 31, 2012, STPL was granted leave to intervene in this docket.
2. On January 25, 2013, the Administrative Law Judges (ALJ’s) assigned to this cause entered an order granting STPL leave to propose alternate routes through Clark and Edgar Counties, the same area where the members of RCECCC own or rent their properties. In its proposal, STPL indicated opposition to both the Primary and Alternate Routes through this area proposed by Petitioner, AMEREN TRANSMISSION COMPANY OF ILLINOIS (“AXTI”), and instead recommended two (2) alternate routes, both of which initially followed a line due east from the Kansas Substation, along existing power transmission lines.

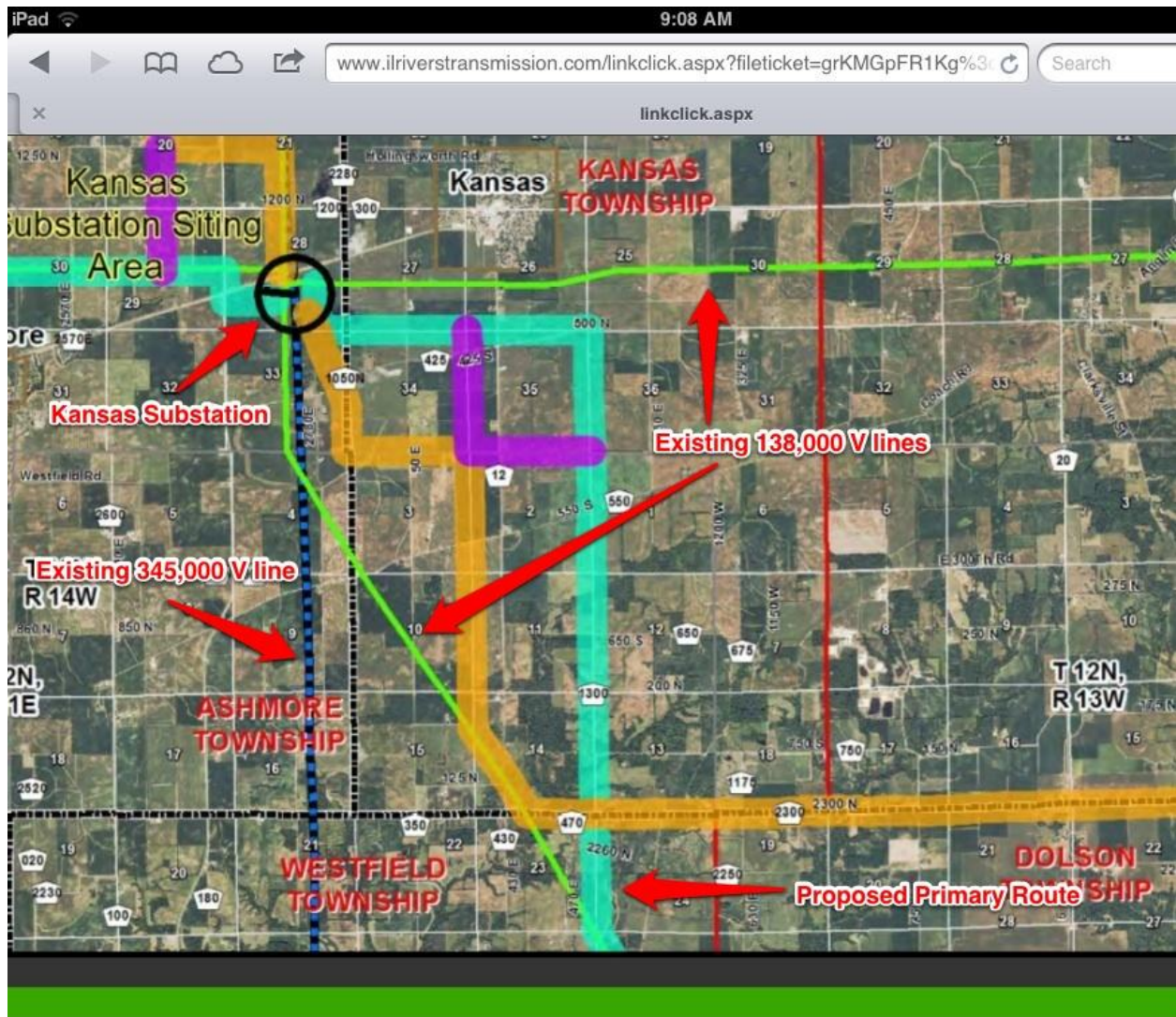
3. On March 14, 2013, RCECCC, was granted leave to intervene in this cause.

4. The main objection of RCECCC throughout the course of this proceeding is the use of the Alternate Route through Clark and Edgar Counties proposed by ATXI, as set forth in great detail in the Direct Testimony of George Orin filed in this cause on March 27, 2013.

5. The members of RCECCC also support the two (2) alternative routes proposed by STPL, at least as the same encourage the use of the existing right-of-ways, as demonstrated by the sworn comments of Mr. Orin (which has previously been stricken from his direct testimony by order of the ALJ's), which provides,¹

“There are already three high-voltage power lines coming into and out of the Kansas Substation. Surely these power lines were developed with the foresight to meet the needs of current and future generations. Ameren already has all the engineering knowledge of these lines, experience working the lines, and the right of ways on which they are located. We believe the path of one of these existing lines would be more economical and therefore should be used to build any new power lines without having the negative effects on the economic development, environment, and farming production in our area that a totally new line of construction would create. There is already an existing high-voltage line north of the Clark-Edgar County line and two existing lines going south of the Clark-Edgar County line. Why drive another completely new line through the center, disrupting the lives and future plans of even more citizens? In support of this contention, the following is a color-coded map which identifies the juxtaposition of the existing power lines through our area and the Primary and Alternate Routes proposed by ATXI:

¹ In their order entered on April 24, 2013, the ALJ's struck on ATXI's motion the majority of Mr. Orin's testimony on this subject as being an untimely alternate route proposal. That being stated, ATXI, in its Reply in Support of Its Motion to Strike Certain Intervenors' Untimely Alternate Route Proposal, filed on April 22, 2013, stated, “Stop the Power Lines Coalition's routes were proposed in accordance with the timing set forth in the Case Management Plan, and if RCECCC wishes to support them, they may do so in accordance with the Case Management Plan.” Further, in the aforementioned order, the ALJ's held, “[A]ny party may endorse another's properly offered route without seeking leave to do so.” In this instance, the testimony of Mr. Orin is not offered for the purpose of proposing an alternate route, but merely to demonstrate the “support” the members of RCECCC have for STPL's alternate routes, which both start out following the existing power line. While the members of RCECCC understand that ATXI and some of the other intervenors in this proceeding may disagree with Mr. Orin's arguments, RCECCC believes the same should be in the record for the Commission to consider when making its ultimate decisions in this case.



Use of the existing right-of-ways, where the underlying and adjacent properties have already been devalued because of their proximity to the transmission lines, would make better sense for all practical purposes, especially from an economic perspective. This is opposed to the Alternate Route, which is depicted by the Orange Line running through the lower center to right of the map, where the members of RCECCC reside. This Alternate Route essentially transverses “virgin” territory which has not yet seen the detrimental effects of being home to a high-voltage power transmission line. Adopting the Alternate Route through this area would result in higher land acquisition costs for ATXI, and no doubt a higher cost of construction, as opposed to using the existing right-of-ways.”

6. RCECCC would note that the Staff, through the direct testimony of Greg Rockrohr, has endorsed the second alternative route proposed by STPL. *See*, Direct Testimony of Greg Rockrohr, Lines 1065-81

7. RCECCC would also note that even according to the testimony of ATXI Rebuttal Witness Jerry A. Murbarber, the second alternative route proposed by STPL is the least cost alternative, compared to ATXI's Primary and Alternate Routes, by \$1,571,000. *See*, Rebuttal Testimony of Jerry A. Murbarger, Lines 50-52, ATXI Exhibit 16.3 (Page 8 of 9).

8. For all of these reasons, RCECCC would request that the support of its members be noted of record in this docket for the timely alternate routes proposed in this docket by STPL.

Respectfully submitted,

RCECCC, Intervenor

By: /s/William F. Moran, III
One of its attorneys

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CERTIFICATE OF SERVICE

I, William F. Moran, III, Co-Counsel for Intervener, hereby certify that on May 3, 2013, I caused a copy of the foregoing **NOTICE OF SUPPORT BY RURAL CLARK AND EDGAR COUNTY CONCERNED CITIZENS FOR THE ALTERNATIVE ROUTES PROPOSED BY STOP THE POWER LINES COALITION** to be served by electronic mail to the individuals on the Commission's Service List for Docket No. 12-0598.

/s/ William F. Moran, III
Co-Counsel for Intervener

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